

Plan Requirements for Sweat Furnaces

What is an OM&M plan?

An operation, maintenance, and monitoring plan (OM&M Plan) describes the actions you will take to ensure proper operation of a sweat furnace and the device that controls emissions of dioxins and furans. You must prepare a written OM&M Plan and follow it. You must give the plan to the Department of Natural Resources (DNR). The mailing address is on the Notice of Compliance Status form. The DNR will review your plan and may require changes before approving your plan. If needed, you may change the original plan; you will have to give the revised plan to the DNR for their review. The checklist below lists the seven basic components of an OM&M plan; section 63.1510(b) in the regulation has more specific information on these components. The OM&M plan is one component of the application that you make for a part 70 or part 71 permit. DNR has not yet established when the permit applications must be submitted for area sources affected by the Secondary Aluminum MACT.

Checklist: The Seven Basic Components of an OM&M Plan

- ☐ A list of the parameters of the sweat furnace and emission control device that you must set and monitor to ensure that the sweat furnace does not emit too much.
- ☐ The schedule for monitoring the parameters in the list.
- ☐ A description of the actions you will take to properly operate and maintain each sweat furnace and the afterburner or other emission control device.
- ☐ A description of the actions you will take to properly operate and maintain the device that monitors the parameters in the list.
- ☐ The actions you will take to monitor the parameters on your list.
- ☐ The actions you will take to repair a sweat furnace or emission control device ("corrective actions") when the value of a parameter differs from its target value or range.
- ☐ The schedule you will follow to maintain a sweat furnace or emission control device.

What is a startup, shutdown, and malfunction plan and how do I implement it?

You must prepare and implement a written plan that describes how you will start a sweat furnace and shut it down to minimize air pollution emissions, and what you will do to minimize air pollution emissions when the sweat furnace or air pollution control equipment malfunctions. This is called a startup, shutdown, and malfunction (SSM) plan. The description of procedures must be specific. You must include the plan in the notification of compliance status report.

A more specific description of the contents of the plan appears in 40 CFR §63.6(e)(3). Your plan must include the following procedures:

- ☐ What you will do to determine the cause of malfunctions.
- ☐ How you will record the cause of malfunctions.
- ☐ How you will record the time the malfunction began and ended.

- ☐ What you will do to repair malfunctioning equipment.
- ☐ How you will record the actions you will have taken to repair malfunctioning equipment and minimize emissions during malfunctions.

You must follow the requirements in 40 CFR §63.10(b) for keeping records of startups, shutdowns, and malfunctions and the actions you take during these events. You must record and report actions that are inconsistent with the procedures in your plan for startups, shutdowns, and malfunctions.